

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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UNITED STATES OF AMERICA

INDICTMENT

v.

CRIMINAL NO. 24-242 (RAM)

**(1) Jose J. Rodriguez-Cumba
aka "Chambi"**

(Counts 1-5, 7-11, 13, 14),

Violations (Fourteen Counts):

Count One:

21 U.S.C. §§ 841(a)(1), (b)(1)(C),
(b)(1)(E), and 846

(2) Richard Cruz-Monzon

(Counts 1, 2, 6, 10-12),

Count Two:

21 U.S.C. §§ 841(a)(1), (b)(1)(E), and 18
U.S.C. § 2.

(3) Yarelis I. Colon-Rios

(Counts 1-3, 8-11, 14),

Count Three:

21 U.S.C. §§ 841(a)(1) and (b)(1)(E) and
18 U.S.C. § 2

**(4) Yarushka M. De Leon-Acosta,
aka "La Secretaria"**

(Counts 1, 2, 6, 7, 10-13),

Count Four:

21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and
18 U.S.C. § 2

**(5) Edwin D. Gonzalez-Reyes
aka "Cotto"**

(Counts 1, 2, 11),

Count Five:

18 U.S.C. § 1791(a)(2) and 18 U.S.C. § 2
(Suboxone)

(6) Jose J. Lopez-Pellot

(Counts 1-5, 8-11, 14),

Counts Six through Nine:

18 U.S.C. § 1791(a)(1) and (a)(2) and 18
U.S.C. § 2

**(7) Christina M. Rodriguez-Cumba aka:
"Nani"**

(Counts 1, 2, 7, 10, 11, 13), and

Count Ten:

18 U.S.C. § 371 and 18 U.S.C. §§
1791(a)(1) and (a)(2).

(8) Selena Crespo-Dumeng

(Counts 1, 2, 10, 11),

Count Eleven:

18 U.S.C. § 1028(a)(7), (b), and (f)

Defendants.

Counts Twelve through Fourteen:

18 U.S.C. § 1028A(a)(1)

Forfeiture Provision:

21 U.S.C. §§ 853 and 970

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THE GRAND JURY CHARGES:

INTRODUCTION:

At all times relevant to this Indictment:

1. The Metropolitan Detention Center (“MDC”) in Guaynabo, Puerto Rico is a facility within the Bureau of Prisons (“BOP”).
2. The BOP is an agency within the United States Department of Justice (“USDOJ”) that is responsible for the administration of the federal prison system.

COUNT ONE

(Conspiracy to Possess with Intent to Distribute Controlled Substances)

From in or about July of 2023 and continuing up to and until May 22, 2024, in Puerto Rico, and elsewhere, and within the jurisdiction of this Court,

- (1) Jose J. Rodriguez-Cumba
aka “Chambi,”**
- (2) Richard Cruz-Monzon,**
- (3) Yarelis I. Colon-Rios,**
- (4) Yarushka M. De Leon-Acosta,
aka “La Secretaria,”**
- (5) Edwin D. Gonzalez-Reyes
aka “Cotto,”**
- (6) Jose J. Lopez-Pellot,**
- (7) Christina M. Rodriguez-Cumba
aka: “Nani,” and**
- (8) Selena Crespo-Dumeng,**

the defendants herein, did knowingly and intentionally, combine, conspire, and agree with one another and others, known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly and intentionally possess with intent to distribute and distribute a mixture or a substance containing a detectable

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amount of Buprenorphine (Suboxone), a Schedule III Narcotic Controlled Substance, a mixture or a substance containing a detectable amount of ketamine, a Schedule III, Narcotic Drug Controlled Substance, and a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl) -4-piperidiny] propenamide (fentanyl), a Schedule II Narcotic Drug Controlled Substances. All in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), (b)(1)(E), and 846.

COUNT TWO**(Possession with Intent to Distribute Controlled Substances)**

From on or about July of 2023 and continuing up to and until May 22, 2024, in the District of Puerto Rico, and within the jurisdiction of this Court,

- (1) Jose J. Rodriguez-Cumba
aka "Chambi,"**
- (2) Richard Cruz-Monzon,**
- (3) Yarelis I. Colon-Rios,**
- (4) Yarushka M. De Leon-Acosta,
aka "La Secretaria,"**
- (5) Edwin D. Gonzalez-Reyes
aka "Cotto,"**
- (6) Jose J. Lopez-Pellot,**
- (7) Christina M. Rodriguez-Cumba
aka: "Nani," and**
- (8) Selenia Crespo-Dumeng,**

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute and distribute a mixture or substance containing a detectable amount of Buprenorphine (Suboxone), a Schedule III Narcotic Controlled Substance, All in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(E) and 18 U.S.C. § 2.

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COUNT THREE

(Possession with Intent to Distribute Controlled Substances)

From or about May 17, 2024 and up to on or about May 22, 2024, in the District of Puerto Rico, and within the jurisdiction of this Court,

**(1) Jose J. Rodriguez-Cumba
aka "Chambi,"**

(3) Yarelis I. Colon-Rios, and

(6) Jose J. Lopez-Pellot,

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute and distribute a mixture or substance containing a detectable amount of ketamine, a Schedule III, Narcotic Drug Controlled Substance. All in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(E) and 18 U.S.C. § 2.

COUNT FOUR

(Possession with Intent to Distribute Controlled Substances)

On or about May 22, 2024, in the District of Puerto Rico, and within the jurisdiction of this Court,

**(1) Jose J. Rodriguez-Cumba
aka "Chambi," and**

(6) Jose J. Lopez-Pellot,

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute and distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl) -4-piperidinyl] propenamide (fentanyl), a Schedule II Narcotic Drug Controlled Substances. All in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2.

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COUNT FIVE
(Possessing Contraband in Prison)

On or about May 22, 2024, in the District of Puerto Rico and within the jurisdiction of this Court,

(1) Jose J. Rodriguez-Cumba
aka "Chambi," and
(6) Jose J. Lopez-Pellot,

the defendants herein, aiding and abetting each other, contrary to 28 C.F.R. §§ 553.12 and 500.1(h), knowingly and intentionally possessed prohibited objects at MDC, a federal detention facility, specifically, a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl) -4-piperidiny] propenamide (fentanyl), a Schedule II Narcotic Drug Controlled Substances. All in violation of 18 U.S.C. § 1791(a)(2).

COUNT SIX THROUGH NINE
(Attempting to Provide Contraband in Prison)

On or about each of the dates listed below, in the District of Puerto Rico and within the jurisdiction of this Court,

(1) Jose J. Rodriguez-Cumba
aka "Chambi,"
(2) Richard Cruz-Monzon,
(3) Yarelis I. Colon-Rios,
(4) Yarushka M. De Leon-Acosta,
aka "La Secretaria,"
(6) Jose J. Lopez-Pellot, and
(7) Christina M. Rodriguez-Cumba
aka: "Nani," and

the defendants herein, aiding and abetting each other, contrary to 28 C.F.R. §§ 553.12 and 500.1(h), knowingly and intentionally attempted to provide prohibited objects,

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specifically, controlled substances, to inmates housed at MDC, a federal detention facility. All in violation of 18 U.S.C. §§ 1791(a)(1) and (a)(2).

Count	Defendants	Date of Offense	Contraband
6	(2) Richard Cruz-Monzon, (4) Yarushka M. De Leon-Acosta,	5/2/2023	Buprenorphine (Suboxone)
7	(1) Jose J. Rodriguez-Cumba aka "Chambi," (4) Yarushka M. De Leon-Acosta, aka "La Secretaria," (7) Christina M. Rodriguez-Cumba aka: "Nani,"	10/30/2023	Buprenorphine (Suboxone)
8	(1) Jose J. Rodriguez-Cumba aka "Chambi," (3) Yarelis I. Colon-Rios, (6) Jose J. Lopez-Pellot,	3/7/2024	Buprenorphine (Suboxone)
9	(1) Jose J. Rodriguez-Cumba aka "Chambi," (3) Yarelis I. Colon-Rios, (6) Jose J. Lopez-Pellot,	5/17/2024 to 5/22/2024	Ketamine

COUNT TEN**(Conspiracy to Provide Contraband in Prison)**

From on or about July of 2023 and continuing up to and until May 22, 2024, in the District of Puerto Rico and within the jurisdiction of this Court,

**(1) Jose J. Rodriguez-Cumba
aka "Chambi,"**

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- (2) Richard Cruz-Monzon,
- (3) Yarelis I. Colon-Rios,
- (4) Yarushka M. De Leon-Acosta,
aka "La Secretaria,"
- (5) Edwin D. Gonzalez-Reyes
aka "Cotto,"
- (6) Jose J. Lopez-Pellot,
- (7) Christina M. Rodriguez-Cumba
aka: "Nani," and
- (8) Selenia Crespo-Dumeng,

the defendants herein, contrary to 28 C.F.R. §§ 553.12 and 500.1(h), did knowingly and intentionally, combine, conspire, and agree with one another and others, known and unknown to the Grand Jury, to commit an offense against the United States and the Bureau of Prisons, that is, to provide prohibited objects, specifically, controlled substances, to inmates housed at MDC, a federal detention facility. All in violation of 18 U.S.C. § 371 and 18 U.S.C. §§ 1791(a)(1) and (a)(2).

COUNT ELEVEN
(Conspiracy to Commit Identity Theft)

From in or about July of 2023 and continuing up to and until May 22, 2024, in the District of Puerto Rico and within the jurisdiction of this Court,

- (1) Jose J. Rodriguez-Cumba
aka "Chambi,"
- (2) Richard Cruz-Monzon,
- (3) Yarelis I. Colon-Rios,
- (4) Yarushka M. De Leon-Acosta,
aka "La Secretaria,"
- (5) Edwin D. Gonzalez-Reyes
aka "Cotto,"
- (6) Jose J. Lopez-Pellot,
- (7) Christina M. Rodriguez-Cumba
aka: "Nani," and
- (8) Selenia Crespo-Dumeng,

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the defendants herein, knowingly and willfully conspired and agreed together and with each other, and with other persons both known and unknown to the grand jury to commit an offense: that is, the defendants did knowingly transfer, possess, and use in or affecting interstate or foreign commerce, without lawful authority, a means of identification of another person, transported in the mail, to wit: names, knowing that the means of identification belonged to another actual person, with the intent to commit, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit: narcotics distribution and providing contraband in a federal detention facility in violation of 18 U.S.C. § 841 and 18 U.S.C. § 1791. All in violation of 18 U.S.C. § 1028(a)(7), (b), and (f).

COUNTS TWELVE THROUGH FOURTEEN
(Aggravated Identity Theft)

On or about each of the dates listed below, in the District of Puerto Rico, and elsewhere, the defendants, (1) Jose J. Rodriguez-Cumba, aka "Chambi," (2) Richard Cruz-Monzon, (3) Yarelis I. Colon-Rios, (4) Yarushka M. De Leon-Acosta, aka "La Secretaria," (6) Jose J. Lopez-Pellot, (7) Christina M. Rodriguez-Cumba aka: "Nani," did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, that is the name of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is a violation of 18 U.S.C. § 1028(f), knowing that the means of identification belonged to another actual person, in violation of 18 U.S.C. § 1028A(a)(1).

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Count	Defendants	Date of Offense	Means of Identification
12	(2) Richard Cruz-Monzon, (4) Yarushka M. De Leon-Acosta,	5/2/2023	Name of J.B.M.
13	(1) Jose J. Rodriguez-Cumba aka "Chambi," (4) Yarushka M. De Leon-Acosta, aka "La Secretaria," (7) Christina M. Rodriguez-Cumba aka: "Nani,"	10/30/2023	Name of B.R.M.
14	(1) Jose J. Rodriguez-Cumba aka "Chambi," (3) Yarelis I. Colon-Rios, (6) Jose J. Lopez-Pellot,	3/7/2024	Name of J.E.L.

NARCOTICS FORFEITURE ALLEGATION

The allegations contained in Counts One through Four of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. §§ 853 and 970. Pursuant to 21 U.S.C. § 853, upon conviction of the controlled substance offense alleged in Counts One through Fourteen, the defendants,

(1) Jose J. Rodriguez-Cumba
aka "Chambi,"
(2) Richard Cruz-Monzon,
(3) Yarelis I. Colon-Rios,
(4) Yarushka M. De Leon-Acosta,
aka "La Secretaria,"
(5) Edwin D. Gonzalez-Reyes

aka "Cotto,"
(6) Jose J. Lopez-Pellot,
(7) Christina M. Rodriguez-Cumba
aka: "Nani,"
(8) Selena Crespo-Dumeng, and

shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

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TRUE BILL,



FOREPERSON

Date: 07/18/24

W. STEPHEN MULDROW
United States Attorney

A handwritten signature in blue ink, appearing to read "Alberto R. Lopez Rocafort".

Alberto R. Lopez Rocafort
Assistant U.S. Attorney
Chief, Gangs Section

A handwritten signature in blue ink, appearing to read "R. Vance Eaton".

R. Vance Eaton
Assistant U.S. Attorney
Gangs Section

A handwritten signature in blue ink, appearing to read "Teresa S. Zapata Valladares".

Teresa S. Zapata Valladares
Assistant U.S. Attorney
Deputy Chief, Gangs Section

A handwritten signature in blue ink, appearing to read "Carlos J. Romo Aldea".

Carlos J. Romo Aldea
Special Assistant U.S. Attorney
Gangs Section